

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES)
OF AMERICA)
)
)
)
V.)
)
MATTHEW MARSH,)
Defendant,)
_____)

CRIMINAL NO. 05CR 40025 FDS

MOTION FOR FUNDS FOR TRANSCRIPTS

The Defendant, by and through his undersigned attorney, respectfully moves this Honorable Court, pursuant to the United States Constitution and the Federal Rules of Criminal Procedure to order the payment of additional fees and costs for the transcription of tapes of conversations of the defendant and co-defendant.

The defendant further requests that this Court order that the Clerk of the Federal District Court provide a certified copy of this motion to defense counsel.

In support of the above, the defendant states, through counsel that:

1. I was appointed to represent Mr. Marsh in this matter;
2. In preparation of this case, counsel has determined that these costs are necessary to try this case effectively;
3. Counsel has been informed that there are numerous tapes of conversations in this matter;
4. Trial counsel is requesting that these tapes be transcribed;
5. Counsel is requesting the court allow funds for this purpose;

6. The Defendant is currently being held at the Wyatt Detention Center in Rhode Island;
7. The defendant contends that the funds he is requesting are reasonably necessary in order to assure that he is able to have as effective a defense as he would have if he were financially able to pay to assure his rights to effective assistance of counsel and to present a defense as guaranteed by the Sixth and Fourteenth Amendments to the United States Constitution.

The above is true to the best of my information and belief and is signed under the pains and penalties of perjury.

Respectfully Submitted,
By: /s/ Alan J. Black
ALAN JAY BLACK, His Attorney
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